

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**NOTICE OF CORRESPONDENCE REGARDING THE ONE HUNDRED  
EIGHTEENTH OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE  
COMMONWEALTH OF PUERTO RICO, PUERTO RICO HIGHWAYS AND  
TRANSPORTATION AUTHORITY, AND EMPLOYEES RETIREMENT SYSTEM OF  
THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO TO  
INDIVIDUAL PROOF OF CLAIM NO. 104010.**

To the Honorable United States District Judge Laura Taylor Swain:

1. On December 12, 2019, the Commonwealth of Puerto Rico (the “Commonwealth”), the Puerto Rico Highways and Transportation Authority (“HTA”), and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight”

---

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Board”), as the sole Title III representative of the Commonwealth, HTA and ERS (collectively, the “Debtors”) pursuant to Section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),<sup>2</sup> filed the *One Hundred Eighteenth Omnibus Objection of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based Upon Unspecified Puerto Rico Statutes* [ECF No. 9568] (the “One Hundred Eighteenth Omnibus Objection”) to various proofs of claim.

2. The One Hundred Eighteenth Omnibus Objection seeks to disallow deficient claims which purport to assert liabilities against the Commonwealth, HTA, or ERS, but which fail to provide critical information needed to understand what liabilities any of the Commonwealth, HTA, ERS, or any other Title III Debtor may owe.

3. The Debtors have received the attached correspondence from Iluminada Velazquez Ramos (“Velazquez Ramos”), a copy of which is attached hereto as Exhibit “A” (the “Velazquez Ramos Response”), regarding Proof of Claim No. 104010 (the “Velazquez Ramos Claim”).

4. The Velazquez Ramos Response consists of a copy of a page from the One Hundred Eighteenth Omnibus Objection. The Velazquez Ramos Response does not, however, contain any additional information necessary to evaluate the Velazquez Ramos Claim, such as an explanation of the basis for the Velazquez Ramos Claim. The Debtors have therefore determined that the Velazquez Ramos Response still does not provide sufficient information to enable the Debtors to reconcile the Velazquez Ramos Claim. Accordingly, the Debtors respectfully request that the Court grant the One Hundred Eighteenth Omnibus Objection and disallow the Velazquez Ramos Claim, notwithstanding the Velazquez Ramos Response.

---

<sup>2</sup> PROMESA is codified at 48 U.S.C. §§ 2101-2241.

Dated: November 13, 2020  
San Juan, Puerto Rico

Respectfully submitted,

/s/ Hermann D. Bauer

Hermann D. Bauer

USDC No. 215205

Carla García Benítez

USDC No. 203708

Daniel J. Perez-Refojos

USDC No. 303909

**O'NEILL & BORGES LLC**

250 Muñoz Rivera Ave., Suite 800

San Juan, PR 00918-1813

Tel: (787) 764-8181

Fax: (787) 753-8944

*Attorneys for the Financial Oversight and  
Management Board for Puerto Rico, as  
representative for the Commonwealth, HTA,  
and ERS*

/s/ Martin J. Bienenstock

Martin J. Bienenstock (*pro hac vice*)

Brian S. Rosen (*pro hac vice*)

**PROSKAUER ROSE LLP**

Eleven Times Square

New York, NY 10036

Tel: (212) 969-3000

Fax: (212) 969-2900

*Co-Attorneys for the Financial Oversight  
and Management Board for the Puerto Rico,  
as representative for the Commonwealth,  
HTA, and ERS*